

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION	Master File No. 12-md-02311 Honorable Marianne O. Battani
In Re: Anti-Vibrational Rubber Parts	2:13-cv-00802
In Re: Radiators	2:13-cv-00803
In Re: Switches	2:13-cv-01002
In Re: Motor Generators	2:13-cv-01003
In Re: HID Ballasts	2:13-cv-01302
In Re: Electronic Power Steering Assemblies	2:13-cv-01303
In Re: Fan Motors	2:13-cv-01502
In Re: Power Window Motors	2:13-cv-01503
In Re: Windshield Washer Systems	2:13-cv-01702
This Document Relates to: All Auto Dealer Actions All End-Payor Actions	2:13-cv-01703
	2:13-cv-01902
	2:13-cv-01903
	2:13-cv-02102
	2:13-cv-02103
	2:13-cv-02302
	2:13-cv-02303
	2:13-cv-02802
	2:13-cv-02803

**STIPULATION AND ORDER REGARDING
DEADLINE FOR FILING ANSWERS TO END-PAYOR AND AUTO DEALERS'
CONSOLIDATED AMENDED CLASS ACTION COMPLAINTS**

WHEREFORE, one or more parties in the above-captioned actions plans to file a motion to correct or amend the Court's May 1, 2015 Opinion and Order Granting in Part and Denying in Part Defendants' Collective Motion to Dismiss End-Payors' and Auto Dealers' Consolidated Amended Class Action Complaints ("May 1, 2015 Order"); and

WHEREFORE, Auto Dealer Plaintiffs and End-Payor Plaintiffs have reached a stipulation with the Defendants¹ regarding the deadline for filing Answers to the Consolidated Amended Class Action Complaints (“CACs”)² in the above-captioned actions, as evidenced by their signatures affixed hereto, the parties, through their undersigned counsel, hereby agree and stipulate, and the Court orders that Answers to the CACs shall be filed 30 days after the Court’s ruling on any of the parties’ motions to correct or amend the Court’s May 1, 2015 Order.

IT IS SO ORDERED.

Date: June 10, 2015

s/Marianne O. Battani
MARIANNE O. BATTANI
United States District Judge

STIPULATED TO AND APPROVED BY:

¹ The Defendants joining this stipulation are: Bridgestone Corporation, Bridgestone APM Company; Sumitomo Riko Company Limited, DTR Industries, Inc.; Toyo Tire & Rubber Co., Ltd., Toyo Tire North America OE Sales LLC, Toyo Automotive Parts (USA), Inc.; Yamashita Rubber Co., Ltd., YUSA Corporation; Calsonic Kansei Corporation, Calsonic Kansei North America, Inc.; DENSO Corporation, DENSO International America, Inc. ASMO Co., Ltd., ASMO North America, LLC, ASMO Manufacturing, Inc.; Mitsuba Corporation, American Mitsuba Corporation; Tokai Rika, Co., Ltd., TRAM, Inc. d/b/a Tokai Rika U.S.A. Inc., Stanley Electric Co., Ltd., Stanley Electric U.S. Co., Inc., II Stanley Co., Inc.; Koito Manufacturing Co., Ltd., North American Lighting, Inc.; Mitsubishi Electric Corporation, Mitsubishi Automotive America, Inc., Mitsubishi Electric US Holdings, Inc.; JTEKT Corporation, JTEKT Automotive North America, Inc.; Showa Corporation, American Showa, Inc.

² Specifically, the CACs are (i) the Auto Dealers’ Consolidated Amended Class Action Complaints in Anti-Vibrational Rubber Parts (Doc. No. 28), Radiators (Doc. No. 31), Switches (Doc. No. 23), Motor Generators (Doc. No. 2), HID Ballasts (Doc. No. 24), Electronic Power Steering Assemblies (Doc. No. 17), Fan Motors (Doc. No. 21), Power Window Motors (Doc. No. 22), and Windshield Washer Systems (Doc. No. 29), and (ii) the End-Payors’ Consolidated Amended Class Action Complaints in Anti-Vibrational Rubber Parts (Doc. No. 20), Radiators (Doc. No. 28), Switches (Doc. No. 11), Motor Generators (Doc. No. 11), HID Ballasts (Doc. No. 10), Electronic Power Steering Assemblies (Doc. No. 9), Fan Motors (Doc. No. 13), Power Window Motors (Doc. No. 18), and Windshield Washer Systems (Doc. No. 8).

May 15, 2015

/s/ Gerard V. Mantese (with consent)

Gerard V. Mantese (P34424)
David Hansma (P71056)
Brendan Frey (P70893)
Joshua Lushnat (P75319)
**MANTESE HONIGMAN ROSSMAN AND
WILLIAMSON, P.C.**
1361 E. Big Beaver Road
Troy, MI 48083
Telephone: (248) 457-9200 Ext. 203
Facsimile: (248) 457-9201
gmantese@manteselaw.com
dhansma@manteselaw.com
bfrey@manteselaw.com
jlushnat@manteselaw.com

*Interim Liaison Counsel for the Automobile Dealer
Plaintiffs*

/s/ Jonathan W. Cuneo (with consent)

Jonathan W. Cuneo
Joel Davidow
Victoria Romanenko
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
Telephone: (202) 789-3960
Facsimile: (202) 789-1813
jonc@cuneolaw.com
Joel@cuneolaw.com
Vicky@cuneolaw.com

Don Barrett
David McMullan
Brian Herrington
BARRETT LAW GROUP, P.A.
P.O. Box 927
404 Court Square
Lexington, MS 39095
Telephone: (662) 834-2488
Facsimile: (662)834.2628
dbarrett@barrettlawgroup.com
bherrington@barrettlawgroup.com
dmcmullan@barrettlawgroup.com

Shawn M. Raiter

LARSON KING, LLP

2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
Telephone: (651) 312-6500
Facsimile: (651) 312-6618
sraiter@larsonking.com

*Interim Co-Lead Counsel for the Automobile Dealer
Plaintiffs*

/s/ Hollis Salzman (with consent)

Hollis Salzman

Bernard Persky

William V. Reiss

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

601 Lexington Avenue, Suite 3400
New York, NY 10022
Telephone: (212) 980-7400
Facsimile: (212) 980-7499
hsalzman@rkmc.com
bpersky@rkmc.com
wvreiss@rkmc.com

Steven N. Williams

Adam J. Zapala

Elizabeth Tran

COTCHETT, PITRE & McCARTHY, LLP

San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
fdamrell@cpmlegal.com
swilliams@cpmlegal.com
azapala@cpmlegal.com
etran@cpmlegal.com

Marc M. Seltzer

Steven G. Sklaver

SUSMAN GODFREY LLP

1901 Avenue of the Stars, Suite 950
Los Angeles, CA 90067-6029
Telephone: (310) 789-3100
Facsimile: (310) 789-3150
mseltzer@susmangodfrey.com

ssklaver@susmangodfrey.com

Terrell W. Oxford
Warren T. Burns
SUSMAN GODFREY LLP
901 Main Street, Suite 5100
Dallas, Texas 75202
Telephone: (214) 754-1900
Facsimile: (214) 754-1933
toxford@susmangodfrey.com
wburns@susmangodfrey.com

Interim Co-Lead Counsel for End-Payor Plaintiffs

E. Powell Miller
Adam Schnatz
THE MILLER LAW FIRM
950 W. University Drive
Suite 300
Rochester, MI 48307
Telephone: (248) 841-2200
epm@millerlawpc.com
aschnatz@millerlawpc.com

Interim Liaison Counsel for End Payor Plaintiffs

/s/ Steven F. Cherry

Steven F. Cherry
David P. Donovan
Brian C. Smith
**WILMER CUTLER PICKERING HALE AND
DORR LLP**
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363
steven.cherry@wilmerhale.com
david.donovan@wilmerhale.com
brian.smith@wilmerhale.com

*Counsel for Defendants DENSO Corporation,
DENSO International America, Inc., ASMO Co.,
Ltd., ASMO North America, LLC, and ASMO
Manufacturing, Inc.*

/s/ Steven M. Zarowny (with consent)

Steven M. Zarowny (P33362)
General Counsel
DENSO INTERNATIONAL AMERICA, INC.
24777 DENSO Drive
Southfield, MI 48033
Tel.: (248) 372-8252
Fax: (248) 213-2551
STEVE_ZAROWNY@DENSO-diam.com

*Counsel for Defendant DENSO International
America, Inc.*

/s/ George A. Nicoud III (with consent)

George A. Nicoud III
Joel S. Sanders
Austin Schwing
Stuart C. McPhail
Leslie A. Wulff
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Tel.: (415) 393-8200
Fax: (415) 393-8306
TNicoud@gibsondunn.com
JSanders@gibsondunn.com
ASchwing@gibsondunn.com
SMcphail@gibsondunn.com
LWulff@gibsondunn.com

*Counsel for Defendants Mitsuba Corporation and
American Mitsuba Corporation*

/s/ Terrence J. Truax (consent)

Terrence J. Truax
Charles B. Sklarsky
Michael T. Brody
Gabriel A. Fuentes
Daniel T. Fenske
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
ttruax@jenner.com
csklarsky@jenner.com
mbrody@jenner.com
gfuentes@jenner.com
dfenske@jenner.com

Gary K. August
Jamie J. Janisch
**ZAUSMER, KAUFMAN, AUGUST &
CALDWELL, P.C.**
31700 Middlebelt Road, Suite 150
Farmington Hills, Michigan 48334-2374
Telephone (248) 851-4111
gaugust@zkac.com
jjanisch@zacfirm.com

*Counsel for Mitsubishi Electric Corporation,
Mitsubishi Electric US Holdings, Inc., and
Mitsubishi Electric Automotive America, Inc.*

/s/ James L. Cooper (with consent)

James L. Cooper
Danielle M. Garten
Adam Pergament
ARNOLD & PORTER LLP
555 Twelfth Street NW
Washington, DC 20004-1206
Tel.: (202) 942-5000
Fax: (202) 942-5999
james.cooper@aporter.com
danielle.garten@aporter.com
adam.pergament@aporter.com

Fred K. Herrmann
Joanne G. Swanson
Kerr, Russell and Weber, PLC
500 Woodward Avenue, Suite 2500
Detroit, MI 48226
Tel.: (313) 961-0200
Fax: (313) 961-0388
fherrmann@kerr-russell.com
jgs@krwlaw.com

*Counsel for Yamashita Rubber Co., Ltd. and
YUSA Corporation*

/s/ J. Clayton Everett, Jr. (with consent)

J. Clayton Everett, Jr.
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW

Washington, DC 20004
Tel.: (202) 739-3000
Fax: (202) 739-3001
jeverett@morganlewis.com

*Counsel for Sumitomo Riko Company Limited and
DTR Industries, Inc.*

/s/ Steven A. Reiss (with consent)

Steven A. Reiss
Adam C. Hemlock
Kaj Rozga
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
Tel.: (212) 310-8000
Fax: (212) 310-8007
steven.reiss@weil.com
adam.hemlock@weil.com
kajetan.rozga@weil.com

Frederick R. Juckniess
Schiff Hardin LLP
350 South Main Street, Suite 210
Ann Arbor, MI 48104
Tel.: (734) 222-1504
fjuckniess@schiffhardin.com

*Counsel for Bridgestone Corporation and
Bridgestone APM Company*

/s/ Steven A. Reiss (with consent)

Steven A. Reiss
Adam C. Hemlock
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
Tel.: (212) 310-8000
Fax: (212) 310-8007
steven.reiss@weil.com
adam.hemlock@weil.com

Fred K. Herrmann
Matthew L. Powell
Kerr, Russell and Weber, PLC
500 Woodward Avenue, Suite 2500

Detroit, MI 48226
Tel.: (313) 961-0200
Fax: (313) 961-0388
fhermann@kerr-russell.com
mpowell@kerr-russell.com

*Counsel for Calsonic Kansei Corporation and
Calsonic Kansei North America, Inc.*

/s/ David C. Giardina (with consent)

David C. Giardina
Courtney A. Rosen
SIDLEY AUSTIN LLP
One S. Dearborn St.
Chicago, IL 60603
Tel.: (312) 853-7000
Fax: (312) 853-7036
dgiardina@sidley.com
crosen@sidley.com

Bradley J. Schram (MI Bar # P26337)
HERTZ SCHRAM PC
1760 S. Telegraph Rd., Suite 300
Bloomfield Hills, MI 48302
Tel.: (248) 335-5000
Fax: (248) 335-3346
bschram@hertzschrampc.com

*Counsel for Toyo Tire & Rubber Co., Ltd.,
Toyo Automotive Parts (USA), Inc., Toyo Tire North
America OE Sales LLC, and Toyo Tire North
America Manufacturing Inc.*

/s/ Matthew J. Reilly (with consent)

Matthew J. Reilly
Abram J. Ellis
David T. Shogren
SIMPSON THACHER & BARTLETT LLP
1155 F Street, N.W.
Washington, DC 20004
Tel.: (202) 636-5500
Fax: (202) 636-5502
matt.reilly@stblaw.com
aellis@stblaw.com
dshogren@stblaw.com

George S. Wang
Shannon K. McGovern
SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, New York 10017
Tel.: (212) 455-2000
Fax: (212) 455-2502

*Counsel for Defendants Stanley Electric Co., Ltd.,
Stanley Electric U.S. Co., Inc. and
II Stanley Co., Inc.*

/s/ Franklin R. Liss (consent)

Franklin R. Liss
Barbara H. Wootton
Tiana Russell
Danielle M. Garten
ARNOLD & PORTER LLP
555 Twelfth Street NW
Washington, DC 20004
Tel: (202) 942-5969
Fax: (202) 942-5999
frank.liss@aporter.com
barbara.wootton@aporter.com
tiana.russell@aporter.com
danielle.garten@aporter.com

Howard B. Iwrey (P39635)
Brian M. Moore (P58584)
DYKEMA GOSSETT PLLC
39577 Woodward Ave., Suite 300
Bloomfield Hills, MI 48304
Tel: (248) 203-0700
Fax: (248) 203-0763
hiwrey@dykema.com
bmoore@dykema.com

*Counsel for Defendants Koito Manufacturing Co.,
Ltd. and North American Lighting, Inc.*

/s/ Heather L. Kafele (consent)

Heather L. Kafele
Keith R. Palfin
Alison R. Welcher

SHEARMAN & STERLING LLP

801 Pennsylvania Ave., NW, Suite 900
Washington, DC 20004
Tel.: (202) 508-8097
Fax: (202) 508-8100
heather.kafele@shearman.com
keith.palfin@shearman.com
alison.welcher@shearman.com

Brian M. Akkashian
PAESANO AKKASHIAN, PC

132 N. Old Woodward Avenue
Birmingham, MI 48009
Tel.: (248) 792-6886
bakkashian@paesanoakkashian.com

*Counsel for JTEKT Corporation and
JTEKT Automotive North America, Inc.*

/s/ Sheldon H. Klein (with consent)

Sheldon H. Klein
David F. DuMouchel

BUTZEL LONG

150 West Jefferson, Suite 100
Detroit, MI 48226
Tel.: (313) 225-7000
Fax: (313) 225-7080
sklein@butzel.com
dumouchd@butzel.com

W. Todd Miller

BAKER & MILLER PLLC

2401 Pennsylvania Ave., NW, Suite 300
Washington, DC 20037
Tel.: (202) 663-7820
Fax: (202) 663-7849
TMiller@bakerandmiller.com

*Counsel for Defendants TRAM, Inc. and
Tokai Rika Co., Ltd.*

/s/ J. Clayton Everett, Jr. (with consent)

J. Clayton Everett, Jr.

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Ave., NW
Washington, DC 20004
Tel: 202-739-3000
Fax: 202-739-3001
jeverett@morganlewis.com

Matthew L. Fornshell
ICE MILLER LLP
250 West Street
Suite 700
Columbus, OH 43215
Tel: 614-462-1061
Fax: 614-222-3692
Matthew.Fornshell@icemiller.com

*Counsel for Showa Corporation and American
Showa, Inc.*